

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**

**District Department of the Environment**

**Air Quality Division**



**FACT SHEET AND STATEMENT OF BASIS  
FOR PROPOSED PERMITTING ACTION  
UNDER 20 DCMR 300 (TITLE V-OPERATING PERMIT PROGRAM)**

This “Fact Sheet and Statement of Basis” has been prepared pursuant to 20 DCMR 303.1(c) and 40 CFR 70.7(a)(5).

**PERMIT NO. 018-R2**

**APPLICANT AND PERMITTEE:**

Omni Shoreham Hotel  
2500 Calvert Street NW  
Washington, DC 20008

**FACILITY LOCATION:**

Omni Shoreham Hotel  
2500 Calvert Street NW  
Washington, DC 20008

**FACILITY DESCRIPTION:**

Omni Shoreham Hotel is located at 2500 Calvert Street, NW in Washington DC. Emission sources in relation to hotel operations consist of: two (2) dual-fuel main boilers for indoor comfort heating and water heating; two (2) emergency generators; seven (7) hot water heaters, two (2) minor natural gas boilers for space heating and hot water; and various kitchen appliances. Four of the seven hot water heaters include four (4) PVI industries hot water heaters that get heat input from steam produced by the main boilers. These four water heaters do not produce any additional air pollutants and therefore are not included as miscellaneous equipment.

This facility includes emission units that are capable of operating twenty-four (24) hours per day, seven (7) days per week, and fifty-two (52) weeks per year. The plant consists of two (2) dual-fuel (natural gas and diesel oil) fired boilers. Boilers CU-1 and CU-2, Clever Brooks, model CB200300015 boilers were installed in 2002 and each one rated at 12.53 million BTU per hour (MMBTU/hr). The two boilers are permitted to fire primarily natural gas and No.2 oil as backup.



**Fact Sheet and Statement of Basis**

**Permit No. 018-R2**

**Omni Shoreham Hotel**

July 30, 2013

Page 2

The source has not made any changes since the issuance of the previous permit No. 018 on September 27, 2004. All emission sources at the facility are identified on the permit.

**EMISSIONS SUMMARY:**

<b>Plant-wide Emissions Summary (tons per year)</b>	
<b>Pollutant</b>	<b>Potential Emissions</b>
Sulfur Dioxide (SO <sub>2</sub> )	56.23
Oxides of Nitrogen (NO <sub>x</sub> )	26.8
Total Particulate Matter (including condensables)	20.40
Volatile Organic Compounds (VOCs)	1.09
Carbon Monoxide (CO)	13.2

Note that the above data are based on revised data submitted by the facility, as opposed to the initial submission in the Title V application dated April 28, 2009. The revised data, however, assumed 0.2% sulfur in the fuel oil from the two larger Cleaver Brooks Boilers, whereas the requirement is less stringent (0.5%). Therefore, the SO<sub>2</sub> emissions potential was revised accordingly.

**BASIS OF 20 DCMR CHAPTER 3 (TITLE V) APPLICABILITY:**

This facility has the potential to emit 26.8 tons per year of oxides of nitrogen (NO<sub>x</sub>). This exceeds the major source threshold in the District of 25 tons per year. As such, pursuant to 20 DCMR 300.1(a), the source is subject to Chapter 3 and must obtain an operating permit in accordance with that regulation and Title V of the federal Clean Air Act.

**LEGAL AND FACTUAL BASIS FOR DRAFT PERMIT CONDITIONS:**

The conditions contained in the Title V operating permit are based on the underlying requirements of 20 DCMR as well as various federal regulations promulgated pursuant to the federal Clean Air Act. The regulations that are the basis of each condition are cited in the permit, except that conditions added to make another condition, with a direct underlying regulation, enforceable as a practical matter may, in some cases, not have a specific citation. These latter, un-cited conditions generally consist of monitoring, record keeping, and reporting requirements authorized under 20 DCMR 500.1.

The permit has been developed to incorporate the requirements of all applicable requirements as defined in 20 DCMR 399.1 along with additional conditions necessary to make all such requirements enforceable as a practical matter.

**Fact Sheet and Statement of Basis**

**Permit No. 018-R2**

**Omni Shoreham Hotel**

July 30, 2013

Page 3

Any condition of the draft Title V Permit that is enforceable by the District but is not federally-enforceable is identified in the Title V permit as such with an asterisk.

It should also be noted that this permit will be issued to include updated requirements established pursuant to 20 DCMR Chapter 2. As such, it will be issued for public notice as a merged permit under the authority of both Chapters 2 and 3.

**REGULATORY REVIEW:**

This facility has been found to be subject to the requirements of the following regulations (except where the conditions of the requirement are included in all District Title V permits, or as discussed below):

**Federal and District Enforceable:**

- 20 DCMR Chapter 1 - General Rules
- 20 DCMR Chapter 2 - General and Non-Attainment Area Permits
- 20 DCMR Chapter 3 – Operating Permits and Acid Rain Programs
- 20 DCMR 500 - Records and reports
- 20 DCMR 502 - Sampling, tests, and measurements
- 20 DCMR 600 - Fuel burning particulate emission
- 20 DCMR 604 - Open Burning
- 20 DCMR 605 - Control of Fugitive Dust
- 20 DCMR 606 - Visible Emissions
- 20 DCMR 800 - Control of Asbestos
- 20 DCMR 801 - Sulfur Contents of Fuel Oils
- 20 DCMR 805 – Reasonably Available Control Technology for Major Stationary Sources of the Oxides of Nitrogen
- 40 CFR 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
- 40 CFR 82, Subpart G - Protection of Stratospheric Ozone (Federally enforceable only except through Title V) (*Note: AQD did not make a positive determination that this regulation was applicable to the facility, but included it as a standard requirement in the permit.*)
- 40 CFR 82, Subpart H - Halon Emissions Reduction (Federally enforceable only except through Title V) (*Note: AQD did not make a positive determination that this regulation was applicable to the facility, but included it as a standard requirement in the permit.*)
- 40 CFR 61.12 – Credible Evidence

**District Enforceable Only:**

- 20 DCMR 402 – Chemical Accident Prevention

## **Fact Sheet and Statement of Basis**

**Permit No. 018-R1**

**Omni Shoreham Hotel**

July 30, 2013

Page 4

20 DCMR 900 - Engine Idling.

20 DCMR 901 - Vehicular Exhaust Emissions.

20 DCMR 902 - Lead Content of Gasoline

20 DCMR 903 - Odorous or Other Nuisance Air Pollutants.

### **Chapter 2 - General and Non-attainment Area Permits:**

No Chapter 2 permits have been issued to this facility since the last Title V permit was issued. It should be noted, however, that a number of requirements were added and updated in this permit pursuant to the District's authority under Chapter 2. Where emission limits were established pursuant to Chapter 2 authority, standard rounding was used. For example, the emission limit for NO<sub>x</sub> when burning natural gas is 0.61 lb/hr. If stack testing were to show emissions at a level of 0.614 lb/hr, this would be considered to be compliant (0.614 rounds to 0.61 which does not exceed 0.61).

### **Greenhouse Gas (GHG) Requirements:**

Because Chapter 3 (Title V) was triggered by other pollutants, no evaluation was made to determine if the facility would trigger Title V applicability under the GHG Tailoring Rule. No modifications have been made to the source that would trigger PSD applicability under the GHG Tailoring Rule. Other than this requirement, there are no other applicable requirements related to GHGs at this time, therefore none were included in the permit.

### **40 CFR 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units**

Because Boilers CU-1 and CU-2 were installed after June 9, 1989 (according to the application, in 2002; according to the Responsible Official, Steve Polli in an email to Stephen Ours on May 28, 2013, in 1999) and have heat input ratings greater than 10 MMBTU/hr (12.53 MMBTU/hr each), this regulation is applicable. The sulfur dioxide requirements of 40 CFR 60.42c(d) are applicable, and have been incorporated in the form of a fuel sulfur requirement in Condition III(a)(2)(B) of the permit. The particulate matter requirements of this regulation are not applicable as the boilers only burn oil and have heat inputs less than 30 MMBTU/hr each.

### **40 CFR 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**

The emergency generators at the facility were installed prior to the trigger dates in the regulation, therefore the regulation is not applicable.

**Fact Sheet and Statement of Basis**

**Permit No. 018-R1**

**Omni Shoreham Hotel**

July 30, 2013

Page 5

**40 CFR 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines**

This regulation is not applicable as the generators are “existing commercial emergency stationary RICE located at an area source of HAP emissions” and are not authorized to participate in ELRP programs or operate in excess of 15 hours per calendar year for voltage deviations. See 40 CFR 63.6585(f)(2) and Condition III(b)(2)(B) of the permit.

**40 CFR 63, Subpart JJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources**

The two boilers at this facility are existing boilers and are permitted to burn natural gas as primary fuel and No. 2 fuel oil only during gas supply interruption, therefore this subpart is **not applicable** as the units are considered gas-fired boilers under the rule. The permittee (Steve Polli) confirmed this during a telephone conversation in November 2012 and in an email to Stephen Ours dated March 21, 2013.

**40 CFR 64 – Compliance Assurance Monitoring (CAM)**

Compliance Assurance Monitoring (CAM) regulations apply to pollutant-specific emission units at a major source that have pre-control devices emissions greater than the Title V major source thresholds and use a control device to achieve compliance. Since this facility does not have any emission units with control devices, CAM is not applicable.

**COMMENT PERIOD:**

Beginning Date: August 2, 2013

Ending Date: September 2, 2013

All written comments should be addressed to the following individual and office:

Stephen S. Ours, P.E.  
Chief, Permitting Branch  
District Department of the Environment  
Air Quality Division  
1200 First Street NE, 5<sup>th</sup> Floor  
Washington, DC 20002

**Fact Sheet and Statement of Basis**

**Permit No. 018-R1**

**Omni Shoreham Hotel**

July 30, 2013

Page 6

**PROCEDURE FOR REQUESTING PUBLIC HEARING:**

During the public comment period any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The District shall grant such a request if it is deemed appropriate. The venue, date, and time for any public hearing shall be announced in the District Register and a daily newspaper.

**POINT OF CONTACT FOR INQUIRIES:**

Olivia Achuko  
Environmental Engineer  
District Department of the Environment  
Air Quality Division  
1200 First Street NE, 5<sup>th</sup> Floor  
Washington, DC 20002  
(202) 535-2997

**REVIEWS:**

Prepared by:



Olivia Achuko  
Environmental Engineer

Approved by:



Stephen S. Ours, P.E.  
Chief, Permitting Branch

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